

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

THOR HALVORSEN,

Plaintiff,

v.

GLENN R. SIMPSON, *et al.*,

Defendants.

No. 18-cv-02683 (JMA) (AYS)

**DECLARATION OF ERIKA LEVIN
IN SUPPORT OF DEFENDANTS'
JOINT OPPOSITION TO
PLAINTIFF'S MOTION FOR
ALTERNATIVE SERVICE**

I, Erika Levin, declare as follows:

1. I am a partner with the law firm of Lewis Baach Kaufmann Middlemiss PLLC, which represents Defendant Francisco Convit-Guruceaga ("Convit").

2. I am familiar with the facts set forth herein and submit this Declaration in support of Defendants' Joint Opposition to Plaintiff's Motion for Alternative Service in the above-captioned matter.

3. Today, through correspondence to Plaintiff's counsel, I provided Plaintiff with an address for Mr. Convit that Plaintiff can use in submitting to the Venezuelan Central Authority to effectuate Hague Service upon Mr. Convit in Venezuela. Mr. Convit's address is not included in this Declaration for security reasons and to keep this information out of the public record. Plaintiff is requested to refrain from unnecessarily publicizing Mr. Convit's address.

4. In addition, through correspondence to Plaintiff's counsel, I provided Plaintiff with a copy of Mr. Convit's Venezuelan National Identity Card and Mr. Convit's Venezuelan Driver's License so that Plaintiff can provide same to the Venezuelan Central Authority in further support of Hague Service upon Mr. Convit. Copies of these cards are not included for

security reasons and to keep this information out of the public record. Plaintiff is requested to refrain from unnecessarily publicizing Mr. Convit's personal information.

I declare under penalty of perjury that the foregoing is true and correct to the best of my actual knowledge and belief. This Declaration was executed by me on August 13, 2018.

Dated: August 13, 2018
New York, New York

Respectfully submitted,

By:



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